

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DR. MANHUA MANDY LIN	:	
	:	
Plaintiff	:	
	:	
vs.	:	CIVIL ACTION NO. 02-CV-3612
	:	
ROHM AND HAAS COMPANY	:	
	:	
Defendant	:	JURY TRIAL DEMANDED
	:	

PLAINTIFF'S MOTION TO COMPEL

Plaintiff, Dr. Manhua Mandy Lin, by and through her counsel, Leonard, Tillery & Sciolla, LLP, hereby moves for an Order pursuant to Fed.R.Civ.P 37 compelling Defendant to provide full and complete responses to Interrogatories and Request for Production of Documents, for an extension of the discovery deadline and for sanctions in the form of an award of attorney's fees incurred in filing this Motion. Plaintiff relies on and hereby incorporates the contents of the accompanying Memorandum of Law in support of this Motion.

Respectfully submitted,
Leonard, Tillery & Sciolla, LLP

By: _____
Hugh J. Hutchison

Date: _____